

## **REMARKS**

Claims 1- 11, 13 – 21, 23 – 25, 27 – 31, 33 - 60 are pending and these same claims have been rejected. Applicants herein amend claims 1, 21, 37, 43, and 55. No new matter has been added.

### ***Claim Rejections – 35 U.S.C. § 103(a)***

Claims 1 – 3, 5, 7, 8, 10, and 13 – 20 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over US Application number 2004/0199521 “Anglin”, in view of US Patent Number 6,578,046 “Chang”, and in view of US Patent Number 6,199,195 “Goodwin.”

Independent claim 1 recites in part:

- a plurality of Items, where each of said plurality of Items constitute a discrete storable unit of information that can be manipulated by a hardware/software interface system;
- a plurality of Item Folders that constitute an organizational structure for said Items, each of said Items belonging to at least one of the Item Folders, wherein said Item Folders are themselves Items and said Items can be modified via any Item Folder they belong to;
- a plurality of Categories that constitute an additional organizational structure for said Items, at least one of said Items belonging to at least one of the Categories, the Item Folders and the Categories arranged in a directed graph structure; and
- a hardware/software interface system for manipulating said plurality of Items.

With respect to claim 1, Applicants respectfully submit that claim 1 as recited patentably defines over the combination of references because the combination fails to teach or suggest all the claim limitations. In an Office Action dated October 16, 2006 the Examiner stated that Anglin discloses “a plurality of Item Folders that constitute an organizational structure for said Items, (see page 2, paragraph [0024]).” (Office Action dated 10/16/06 at p. 3). Specifically, the Examiner cites to Anglin arguing that “Storage Objects [Items] may be defined as part of a storage group [Item Folder] by adding the group identified of one or more groups in which the storage object is a member to the group field of the storage object entry.” (Office Action dated 10/16/06 at p. 3). Applicants submit that the cited portion of Anglin does not disclose a plurality of “Item Folders, wherein said Item Folders are themselves Items

and said Items can be modified via any Item Folder they belong to.” The Item Folders of claim 1 are patentably distinct from the groups of Anglin for at least the following reason. As stated in Anglin, the objects may be organized in groups and the groups type may indicate a relationship between the group members however claim 1 recites an item belonging to a plurality of item folders wherein said Items can be modified via any Item Folder they belong to.

Moreover Applicants submit that claim 1 patentably defines over the combination for at least one additional reason. Claim 1 recites “a plurality of Item Folders that constitute an organizational structure for said Items, each of said Items belonging to at least one of the Item Folders, wherein said Item Folders are *themselves Items*.” Anglin states that “a group is collection of distinct objects, which are managed as a single logical entity”, and “when storing these objects, the storage management program ... saves metadata for the objects showing that they are grouped together.” (Anglin, paragraph [0005], p. 1). Accordingly, Applicants respectfully request reconsideration of the rejection.

With respect to claims 2 – 11, 13 – 20, Applicants submit that since they incorporate by reference all the limitations of claim 1, they too are patentably distinct from the cited references. Accordingly, Applicants respectfully request reconsideration of the rejection.

Insomuch as claims 21, 37, 43, 49, and 55 recite similar elements to that of claim 1 they patentably define over the cited references. Insomuch as claims 23 – 25, 27 – 31, 33 – 42, 44 – 48, 50 – 54, 56 – 60 depend directly or indirectly from claims 21, 37, 43, 49, and 55 they also patentably define over the references. Accordingly, Applicants respectfully request reconsideration of the rejection.

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**PATENT  
REPLY FILED UNDER EXPEDITED  
PROCEDURE PURSUANT TO  
37 CFR § 1.116**

In view of the foregoing amendments and remarks, Applicants submit that the above-identified application is in condition for allowance. Early notification to this effect is respectfully requested.

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